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# EXHIBIT A

Boulder District/County Courts District Court, Boulder County, Colorado 1777 Sixth St Boulder CO 80302		16 FEB 22 AM 8:46
<b>THE PEOPLE OF THE STATE OF COLORADO,</b> Plaintiff,  v. <b>Melody Stoops,</b> Defendant.		COURT USE ONLY
Attorney for Defendant: David L. Owen, Jr.: Atty. Reg.# 39669 718 Huntington Place Highlands Ranch, CO 80126-4730 Phone: 303-993-7092 Fax: 720-242-8907 E-Mail: davidowen@lodopc.com		Case No.: 2013-cr-1273   CrtRm/Div.: 6
<b>MOTION FOR EARLY TERMINATION OF UNSUPERVISED PROBATION</b>		

COMES NOW Ms. Melody Stoops, by and through her attorney David L. Owen, Jr., of The Law Office of David L. Owen, Jr., P.C., and respectfully requests this Court's Order terminating her sentence of probation. In support thereof counsel states as follows:

1. On September 18, 2013, Ms. Stoops was arrested and charged in Count 1 with Attempted Theft \$500 - \$1,000.00 in violation of C.R.S. 18-4-401(1), (2)(b.5); in Count 2 with Theft \$1,000 - \$20,000 in violation of C.R.S. 18-4-401(1), (2)(c); in Count 3 with Computer Crime - commit theft \$1,000 - \$20,000 in violation of C.R.S. 18-5.5-102(1)(d); in Count 4 with Theft in violation of C.R.S.

2/25/16 Due to no objection by the P.A. - Motion is Granted. JSB

18-4-401(1),(4); in Count 5 with Theft in violation of C.R.S. 18-4-401(1),(4); in Count 6 with violation of C.R.S. 18-5-102(1)(d); in Count 7 with Forgery in violation of C.R.S. 18-5-102(1)(d); in Count 8 with Offering False Instrument in violation of C.R.S. 18-5-114(1); and, in Count 9 with Offering False Instrument in violation of C.R.S. 18-5-114(1).

2. On November 21, 2013, Ms. Stoops appeared before this Honorable Court and pursuant to a negotiated plea agreement entered a guilty plea to Count 1 - Attempted Theft, a Class 2 Misdemeanor and to Count 6 - Forgery, a Class 5 Felony. The Court imposed a Deferred Sentence & Judgment on Count 6 and a four (4) year term of unsupervised probation for both counts.

3. Ms. Stoops has complied with all court directives and has paid all restitution, court costs, fees, surcharges, and fines assessed by the Court. She has also completed the 100 hours of community service.<sup>1</sup>

4. Ms. Stoops has experienced difficulty in obtaining meaningful employment and housing due to the current felony conviction. Upon completion of the probation term the deferred judgment on Count 6 will be reversed, the charges dismissed and Ms. Stoops will no longer have a felony conviction. Should the Court grant early termination of unsupervised probation then Ms. Stoops will be able to obtain meaningful housing and employment earlier.

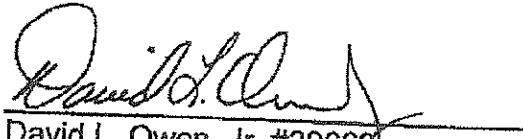
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<sup>1</sup>Attached and incorporated herein is a copy of the 11/26/2014 Letter of Completion.

5. Counsel has conferred with the attorney for the State who has indicated no objection to the granting of this request for early termination of unsupervised probation.

WHEREFORE, Ms. Melody Stoops respectfully requests this Court's Order terminating her sentence of probation.

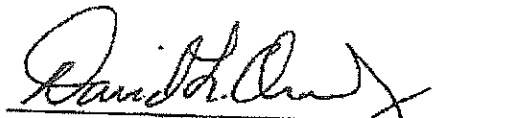
Respectfully submitted this 22nd day of February, 2016.

  
David L. Owen, Jr. #39669  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 22nd day of February, 2016 a true and correct copy of the foregoing was placed in the United States mail, first-class postage affixed thereto, addressed as follows:

Richard H. Ferro  
Assistant Attorney General  
Office of the Attorney General of Colorado  
Criminal Justice Section  
Medicaid Fraud Control Unit  
1300 Broadway, 9th Floor  
Denver, Colorado 80203

  
David L. Owen, Jr.